



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

February 4, 2022

The request is granted. Defendant shall respond by February 22, 2022. The conference schedule for February 11, 2022 is hereby adjourned to March 11, 2022 at 10 a.m.

SO ORDERED.
/s/ Alvin K. Hellerstein
February 8, 2022

VIA ECF

Hon. Alvin K. Hellerstein
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: *Barry v. Mayorkas, et al.*, No. 21 Civ. 6604 (AKH)

Dear Judge Hellerstein:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate his Application to Register Permanent Residence or Adjust Status (Forms I-485). On behalf of the government, I write respectfully to request an on-consent extension of time to respond to the complaint from February 7 to February 22, 2022. If the Court grants the requested extension, the government respectfully requests that the initial conference scheduled for February 11, 2022, be adjourned until the week of February 28, 2022, or thereafter.

The extension is respectfully requested to allow the parties additional time to explore a potential resolution of this dispute without intervention of the Court. This is the government’s third request for an extension of the deadline to respond to the complaint.¹ Plaintiff consents to this request. I apologize for making this request one day before the government’s response is due; however, counsel were unable to confer until today regarding the proposed extension.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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United States Attorney

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cc: Counsel of record (via ECF)

¹ On October 6 and December 6, 2021, the government requested extensions of time to respond to the complaint, which the Court granted. See ECF Nos. 16-19.